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File No. 57191.00048
Attorneys for Defendant, Caesars License Company, LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE

ALBERTO HERNANDEZ,

Plaintiff,

vs.

CAESARS LICENSE COMPANY, LLC, entity
d/b/a, HARRAH'S RESORT ATLANTIC CITY,

Defendant.

CIVIL ACTION NO.

1:19-cv-06090-RBK/KMW

**MOTION TO DISMISS
PLAINTIFF'S COMPLAINT
PURSUANT TO F.R.C.P.
12(b)(1) FOR LACK OF ARTICLE
III STANDING/SUBJECT MATTER
JURISDICTION AND F.R.C.P.
12(b)(6) FOR FAILURE TO STATE
A CLAIM UPON WHICH RELIEF
CAN BE GRANTED**

**TO: Stamatios Stamoulis, Esquire
Stamoulis & Weinblatt LLC
800 N. West Street, Third Floor
Wilmington, DE 19801
stamoulis@swdelaw.com**

PLEASE TAKE NOTICE that the undersigned will apply to the above named Court, at the United States District Court, Mitchell H. Cohen Courthouse, One John F. Gerry Plaza, 4th & Cooper Streets Camden, New Jersey, on June 17, 2019, for an Order dismissing Plaintiff's

Complaint pursuant to F.R.C.P. 12(b)(1) for lack of Article III standing/subject matter jurisdiction and F.R.C.P. 12(b)(6) for failure to state a claim upon which relief can be granted.

Reliance will be placed upon the Brief in Support of the Motion.

A Proposed Form of Order is attached.

The undersigned requests oral argument if opposition is timely filed.

COOPER LEVENSON, P.A.

By:



Russell L. Lichtenstein
Attorneys for Defendant, Caesars License
Company, LLC

Dated: May 22, 2019

CLAC 4970395.1